

August 9, 2012

Lester Heltzer, Executive Secretary
National Labor Relations Board
1099 14th Street, NW, Room 11600
Washington, D.C. 20570-0001

Re: AmbuServe Ambulance (21-RC-081393)

Dear Executive Secretary Heltzer:

The undersigned is legal counsel to Petitioner, National Emergency Medical Services Association ("NEMSA"), in regards to the above-referenced matter. Please allow this letter to serve as NEMSA's opposition to the Employer's request for a 14-day extension in which to file exceptions to the Regional Director's Report on Objections ("RDRO") dated August 7, 2012.

The Employer's request fails to set forth facts sufficient to constitute good cause to grant the requested extension. The Employer's representative has not identified any unanticipated events, personal afflictions or compelling circumstances necessitating the requested extension. Instead, the Employer's representative merely asserts that he, like many of us, has other work to perform over the next 14 days. The filing of exceptions to the RDRO does not require the Employer's representative to be in two places at the same time or otherwise create a similar logistical conflict. Simply having other regularly scheduled work to perform does not constitute good cause for doubling the amount of time ordinarily allotted to parties desiring to file exceptions to an RDRO.

NEMSA respectfully requests that the Employer's request for a 14-day extension in which to file objections to the RDRO be summarily denied. If, however, an extension is granted, the Employer should not be afforded more than three days, or until August 24, 2012, to file its objections.

Sincerely,



Timothy K. Talbot



Timothy K. Talbot
ATTORNEY AT LAW
105 E. Street, Suite 2E
Davis, CA 95616
☎ 530.792.7211 voice
☎ 530.792.8891 fax
✉ ttalbot@talbotlawgroup.com

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

AMBUSERVE AMBULANCE

Employer,

And

Case No. 21-RC-081393

NATIONAL EMERGENCY MEDICAL
SERVICES ASSOCIATION, NAGE/SEIU
LOCAL 5000 (NEMSA),

Petitioner.

_____ /

CERTIFICATE OF SERVICE

I, Heidi Primack Talbot, certify that on August 9, 2012, I e-filed and served via email a letter from Timothy K. Talbot opposing the Employer's Request for a 14 day extension to file exceptions to the Regional Director's Report on Objections to the following persons and email addresses:

H. Sanford Rudnick, JD
Labor Consultant for Employer AmbuServe Ambulance
H. Sanford Rudnick & Associates
1200 Mt. Diablo Blvd., Suite 105
Walnut Creek, CA 94596
sandy@rudnick.com

Bruce Hill
Assistant Regional Director
National Labor Relations Board, Region 21
888 South Figueroa Street, 9th Floor
Los Angeles, CA 90017-5449
Bruce.Hill@nllrb.gov

/s/ Heidi Primack Talbot